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December 19, 2017

VIA ECF AND HAND DELIVERY

The Honorable Naomi Reice Buchwald
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *In re LIBOR-Based Fin. Instruments Antitrust Litig.*, 11-md-2262 (NRB)
Metzler Inv. GmbH v. Credit Suisse Grp. AG, 11-cv-2613 (NRB)

Dear Judge Buchwald:

I write on behalf of all non-settling Defendants in the above-referenced action¹ regarding the schedule for Defendants to answer Exchange-Based Plaintiffs' ("Plaintiffs") Corrected Fourth Amended Consolidated Class Action Complaint (the "CFAC"), filed on December 11, 2017, ECF No. 2363. The parties previously agreed to postpone Defendants' time to answer, pending Plaintiffs' submission of a corrected complaint. *See* ECF No. 2317. After the Plaintiffs filed the CFAC, the parties met and conferred and agreed that Defendants' answers should be due on February 15, 2018.

The requested schedule is appropriate for several reasons. First, the CFAC is lengthy. At 314 pages and 705 paragraphs, the CFAC is approximately twice as long as the OTC Plaintiffs' Corrected Third Consolidated Amended Complaint, for which the Court granted 45 days to answer. *See* ECF No. 1883. Second, it is challenging for Defendants' counsel to coordinate with their clients over the next few weeks due to the winter holidays. Third, there will be no prejudice to Plaintiffs or delay in the litigation from the requested extension, because discovery is stayed pending resolution of Plaintiffs' motion for class certification.

Accordingly, Defendants request that the Court so-order this proposed schedule.

Respectfully submitted,

/s/ David R. Gelfand

David R. Gelfand

cc: All Counsel (via ECF)

¹ The non-settling Defendants are: Bank of America, N.A.; JPMorgan Chase Bank, N.A.; UBS AG; and Coöperatieve Rabobank U.A.